

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PARS EQUALITY CENTER;
ONEAMERICA; PAMELA WHITEHALL
RAGHEBI; AFSHIN RAGHEBI; ZEINAB
MOHAMED HASSAN; SIRAJI ETHA
SIRAJI; MALAYEEN AHMED; REZA
AZIMI; YAHYA GHALEB; MITRA
HANNANI; NICHOLAS HANOUT;
HOSSEIN ZAMANI HOSSEINABADI;
HODA MEHRABI MOHAMMADABADI;
JOHN DOES #1-3; and JANE DOE #1,

Plaintiffs,

v.

MIKE POMPEO; KIRSTJEN NIELSEN;
KEVIN K. MCALEENAN; U.S.
DEPARTMENT OF HOMELAND
SECURITY; U.S. DEPARTMENT OF
STATE; and U.S. CUSTOMS AND
BORDER PROTECTION,

Defendants.

No. 2:18-cv-1122

**DECLARATION OF
JESSICA N. WALDER IN SUPPORT
OF PLAINTIFFS' MOTION**

I, Jessica N. Walder, upon my personal knowledge, hereby declare as follows:

1. I am an attorney with Lane Powell PC, counsel of record for Plaintiffs in this action, older than 18 years of age, and have personal knowledge of and competent to testify to the matters below.

2. On July 24, 2018, I visited the website of the Southern Poverty Law Center and downloaded a copy of the report, "Latest FBI Numbers Show Anti-Muslim Hate Crimes

1 Continue Rise, Suggest Growing Shift Toward Violence Against People,” *available at*
 2 [https://www.splcenter.org/hatewatch/2017/11/14/latest-fbi-numbers-show-anti-muslim-hate-](https://www.splcenter.org/hatewatch/2017/11/14/latest-fbi-numbers-show-anti-muslim-hate-crimes-continue-rise-suggest-growing-shift-toward)
 3 [crimes-continue-rise-suggest-growing-shift-toward](https://www.splcenter.org/hatewatch/2017/11/14/latest-fbi-numbers-show-anti-muslim-hate-crimes-continue-rise-suggest-growing-shift-toward). A true and correct copy of this report is
 4 attached as Exhibit A.

5 3. On July 24, 2018, I visited the website of the Southern Poverty Law Center
 6 and downloaded a copy of the report, “How Trump’s Nativist Tweets Overlap with Anti-
 7 Muslim and Anti-Latino Hate Crimes,” *available at*
 8 [https://www.splcenter.org/hatewatch/2018/05/18/how-trump%E2%80%99s-nativist-tweets-](https://www.splcenter.org/hatewatch/2018/05/18/how-trump%E2%80%99s-nativist-tweets-overlap-anti-muslim-and-anti-latino-hate-crimes)
 9 [overlap-anti-muslim-and-anti-latino-hate-crimes](https://www.splcenter.org/hatewatch/2018/05/18/how-trump%E2%80%99s-nativist-tweets-overlap-anti-muslim-and-anti-latino-hate-crimes). A true and correct copy of this report is
 10 attached as Exhibit B.

11 4. On July 24, 2018, I visited the website of the Southern Poverty Law Center
 12 and downloaded a copy of the report, “Trump’s Anti-Muslim Words and Policies Have
 13 Consequences,” *available at* [https://www.splcenter.org/news/2018/04/24/trumps-anti-muslim-](https://www.splcenter.org/news/2018/04/24/trumps-anti-muslim-words-and-policies-have-consequences)
 14 [words-and-policies-have-consequences](https://www.splcenter.org/news/2018/04/24/trumps-anti-muslim-words-and-policies-have-consequences). A true and correct copy of this report is attached as
 15 Exhibit C.

16 5. On July 24, 2018, I visited the website of the Southern Poverty Law Center
 17 and downloaded a copy of the report, “The Persistence of Anti-Muslim Hate on Facebook,”
 18 *available at* [https://www.splcenter.org/hatewatch/2018/05/05/persistence-anti-muslim-hate-](https://www.splcenter.org/hatewatch/2018/05/05/persistence-anti-muslim-hate-facebook)
 19 [facebook](https://www.splcenter.org/hatewatch/2018/05/05/persistence-anti-muslim-hate-facebook). A true and correct copy of this report is attached as Exhibit D.

20 6. On July 24, 2018, I visited the website of CAIR-CA and downloaded a copy of
 21 the report, “2018 CAIR National Civil Rights Report,” *available at*
 22 <https://ca.cair.com/sfba/publications/2018-cair-national-civil-rights-report/>. A true and
 23 correct copy of this report is attached as Exhibit E.

24 7. On July 24, 2018, I visited the website of CAIR-CA and downloaded a copy of
 25 the report, “2017 CAIR-CA Civil Rights Report,” *available at*
 26 <https://ca.cair.com/sfba/publications/2017-civil-rights-report/>. A true and correct copy of this
 27 report is attached as Exhibit F.

Index of Exhibits

- 1
- 2
- 3 Ex. A Southern Poverty Law Center, *Latest FBI Numbers Show Anti-Muslim Hate Crimes Continue to Rise, Suggest Growing Shift Toward Violence Against People* (Nov. 14, 2017), <https://www.splcenter.org/hatewatch/2017/11/14/latest-fbi-numbers-show-anti-muslim-hate-crimes-continue-rise-suggest-growing-shift-toward>.
- 4
- 5
- 6 Ex. B Southern Poverty Law Center, *How Trump's Nativist Tweets Overlap with Anti-Muslim and Anti-Latino Hate Crimes* (May 18, 2018), <https://www.splcenter.org/hatewatch/2018/05/18/how-trump%E2%80%99s-nativist-tweets-overlap-anti-muslim-and-anti-latino-hate-crimes>.
- 7
- 8 Ex. C Southern Poverty Law Center, *Trump's Anti-Muslim Words and Policies Have Consequences* (Apr. 24, 2018), <https://www.splcenter.org/news/2018/04/24-trumps-anti-muslim-words-and-policies-have-consequences>.
- 9
- 10 Ex. D Southern Poverty Law Center, *The Persistence of Anti-Muslim Hate on Facebook* (May 05, 2018), <https://www.splcenter.org/hatewatch/2018/05-05/persistence-anti-muslim-hate-facebook>
- 11
- 12 Ex. E Council on American-Islamic Relations—California, *2018 CAIR National Report*, <https://ca.cair.com/sfba/publications/2018-cair-national-civil-rights-report> (last visited July 24, 2018).
- 13
- 14 Ex. F Council on American-Islamic Relations—California, *2017 CAIR National Report*, <https://ca.cair.com/sfba/publications/2017-civil-rights-report/> (last visited July 24, 2018).
- 15
- 16 Ex. G Matt Stevens & Matt Hamilton, *Man stabs worshiper near Simi Valley mosque in hate crime, police allege*, Los Angeles Times (Dec. 12, 2016), <http://www.latimes.com/local/lanow/la-me-ln-simi-valley-mosque-stabbing-20161211-story.html>.
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- 18
- 19 Ex. H Deepti Hajela, *Attacks target Muslim-American activist after DC march*, Associated Press (Jan. 26, 2017), <https://apnews.com/-30499a4ba384447ba85b4054e87407dd>.
- 20
- 21 Ex. I Mark Gomez and Jason Green, *Woman wearing hijab attacked at San Jose State*, The Mercury News (Nov. 9, 2016), <https://www.mercurynews.com/2016/11/09/woman-wearing-hijab-attacked-at-san-jose-state/>.
- 22
- 23 Ex. J Ryan Lenz, *Daily Stormer Targets Federal Judges Ruling Against Trump's Muslim Ban*, The Southern Poverty Law Center (Feb. 01, 2017), <https://www.splcenter.org/hatewatch/2017/02/01/daily-stormer-targets-federal-judges-ruling-against-trumps-muslim-ban>.
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- 25
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CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the United States and the laws of the State of Washington, that on the 31st day of July, 2018, the foregoing document was served on the following individuals in the manner set forth below: N/A

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

Michael R. Pompeo c/o United States Department of State 2201 C Street NW, Room 4330, Washington DC 20037	Kirstjen Nielsen c/o United States Department of Homeland Security 3801 Nebraska Ave NW Washington DC 20016
Kevin McAleenan c/o United States Customs and Border Patrol 1300 Pennsylvania Ave. NW Washington, DC 20229	United States Department of Homeland Security 3801 Nebraska Ave NW Washington DC 20016
United States Department of State 2201 C Street NW, Room 4330, Washington DC 20037	United States Customs and Border Protection 1300 Pennsylvania Ave. NW Washington, DC 20229

Executed on the 31st day of July, 2018, at Seattle, Washington.

s/ Jessica Walder

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